

LAW OFFICES OF

OMRANI & TAUB, P.C.

MICHAEL A. TAUB, ESQ.
ALEX A. OMRANI, ESQ.

ASSOCIATE ATTORNEYS

SAN RAZZANO, ESQ.
ISAAC A. ARASTEH, ESQ.
JAMES L. FORDE, ESQ.
ERIN K. HURLEY, ESQ.
ROYA NAMVAR, ESQ.

PARALEGALS

LISA RODRIGUEZ
NATALIE FERREIRA
ANA ESTRELLA
MARIA COLON
MONICA RODRIGUEZ
MERGIME BERISHA
FELICIA VARGAS

488 MADISON AVENUE – 20TH FLOOR

NEW YORK, NEW YORK 10022

TEL: (212) 714-1515

FAX: (212) 599-5551

(212) “LAW-SUIT”

WWW.OMRANITAUB.COM

WWW.212LAWSUIT.COM

QUEENS OFFICES:

80-01 Broadway
Elmhurst, NY 11373
(718) 714-1515

75-26 Broadway
Elmhurst, NY 11373
(718) 714-1515

WESTCHESTER OFFICE:

76 S. Lexington Ave.
White Plains, NY 10606
(914) 714-1515

April 11, 2024

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
Courtroom 12C
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/15/2024

MEMORANDUM ENDORSED

Re: Raul Amador v. Dylan S. Osma and Kycenos Trucking LLC
Case No.: 1:23-cv-09634-GHW (originally assigned case number
7:23-cv-09634-CS)

Your Honor:

Our law firm represents the plaintiff, Raul Amador, in the above-mentioned action. Pursuant to the Court's Directive dated April 4, 2024, we respectfully request that the action not be dismissed as the defendants have been timely served and instead have failed to answer and are in default.

The affidavits of service showing proof of service, pursuant to Federal Rules of Civil Procedure 4(m), on defendant Kycenos Trucking LLC and Dylan S. Osma were uploaded onto PACER as Document Numbers 8, 10 and 9 respectively. In that defendants have failed to timely answer and to avoid motion practice, we have notified defendants' insurance carrier Progressive via letter of the pending default and have requested that an Answer be interposed within the next 10 days. Attached herein is said letter to the carrier.

We respectfully thank the Court for its consideration.

Respectfully submittd,

Roya Namvar

ROYA NAMVAR, ESQ.

The Court does not expect to take further action with respect to its April 4, 2024 order to show cause at this time. The Court expects that any application for the issuance of an order to show cause for default judgment would be filed no later than April 29, 2024, in a manner consistent with the Court's Individual Rules of Practice.

SO ORDERED.

Dated: April 15, 2024
New York, New York

Gregory H. Woods

GREGORY H. WOODS
United States District Judge